

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

**Case No.: 1:25-cv-20757-JB/Torres**

JANE DOE,  
Plaintiff,

v.

STEVEN K. BONNELL II,  
Defendant.

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**REPLY DECLARATION OF ANDREW B. BRETTLER**

I, Andrew B. Brettler, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned action. I am a partner at the law firm Berk Brettler LLP in West Hollywood, California. Along with our local counsel at Bilzin Sumberg Baena Price & Axelrod LLP, we represent Defendant Steven K. Bonnell II. I have personal knowledge of the matters contained herein and if called upon to testify could offer competent testimony thereto.

2. I submit this Reply Declaration in further support of Bonnell's Motion for a Protective Order, dated November 4, 2025 [ECF No. 163] and in response to Plaintiff's Opposition to that Motion, dated November 12, 2025 [ECF No. 177].

3. Throughout her Opposition, Plaintiff makes scattered references to me having to be in Miami for another matter on November 4, 2025. (*See, e.g.*, Opp'n at 5, 10.) That is not true. The *only* reason I needed to be in Miami during the week of November 3 was for the party depositions noticed in this case.

4. Plaintiff's counsel cites to an email I sent on September 22, 2025, in which I referred to having a "court hearing in another matter" on November 4. [ECF No. 163-3.] At the time I sent that email, I had a *video teleconference* hearing scheduled in *E.E.O.C. v. Paia Inn, LLC*, Case No. 25-cv-00199-JMS-RT (D. Haw., filed May 15, 2025) for November 4 beginning at 10:00 a.m. HST. In any event, as a result of the government shutdown, on October 1, 2025, the U.S. District Court for the District of Hawaii stayed that case and continued the conference to December 10.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on November 17, 2025.

s/ Andrew B. Brettler

Andrew B. Brettler